

1 MARK B. HANSON, ESQ.
2 Second Floor, Macaranas Building
3 Beach Road, Garapan
4 PMB 738 P.O. Box 10,000
5 Saipan, Mariana Islands 96950
Telephone: (670) 233-8600
Facsimile: (670) 233-5262
E-Mail: mark@saipanlaw.com

6 Attorney for Plaintiffs

7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE
9 NORTHERN MARIANA ISLANDS

10 LI YING HUA, LI ZHENG ZHE and XU JING JI,) CASE NO. CV 05-0019
11 Plaintiffs,) EX PARTE MOTION UNDER LOCAL
12 vs.) RULES 7.1.h.3(b) AND 7.1.h.5 FOR AN
13 JUNG JIN CORPORATION, a CNMI corporation,) ORDER SHORTENING TIME FOR
14 ASIA ENTERPRISES, INC., a CNMI corporation,) CONSIDERATION OF PLAINTIFFS'
15 PARK HWA SUN and KIM HANG KWON,) APPLICATION FOR A
16 Defendants.) THIRD ORDER IN AID OF
) JUDGMENT
Date: none requested
Time: none requested
Judge: Hon. Alex R. Munson, Chief Judge

17 Plaintiffs, by and through their undersigned attorney of record, hereby file this Motion to
18 Shorten Time, *ex parte*, pursuant to Fed R. Civ. P. 6(d) and Local Rule 7.1.h.5 for consideration of
19 the Application of Plaintiffs for a Third Order in Aid of Judgment pursuant to Fed. R. Civ. P. 69(a)
20 and Title 7, Sections 4205 of the Commonwealth Code (2000).

21 CERTIFICATE PURSUANT TO LOCAL RULE 7.1.H.3(b)

22 1. I am the attorney for Plaintiffs in the above-captioned case. I submit this certificate
23 pursuant to Local Rules 7.1.h.3(b) in support of Plaintiffs' *ex parte* motion for an order shortening
24 time for considering Plaintiffs' Application for a Third Order in Aid of Judgment. In support of this
25 motion, Plaintiffs submit this Certificate of the undersigned.

26

27

2. This matter was scheduled for hearing on April 12, 2007 to determine the status of certain liens on property of Defendants seized by the United States Marshal pursuant to prior orders in aid of judgment in this matter.

3. On March 15, 2007, third-party lienholder Pil Sun Kim Kitami filed with the Court a Relinquishment of Security Interests.

4. There is no further issue of liens or encumbrances with regard to the remaining assets of Defendants seized by the United States Marshal.

8 5. There is no further need for a hearing to determine whether Defendants' leasehold interest
9 in Lot 056 H14 located in Susupe, Saipan, Commonwealth of the Northern Mariana Islands, can be
10 sold free and clear of all liens and encumbrances.

11 6. There is no further need for a hearing to determine whether the 2005 Toyota Tacoma,
12 License Plate No. ACF873, VIN# 5TENX22N35Z025455 and the 2003 Kia Sorento, License Plate
13 No. ABR529, VIN# KNDJC733235161240 can be sold free and clear of all liens and encumbrances.

¹⁴ 7. Time is of the utmost essence.

15 8. Defendants are proceeding *pro se* since the withdrawal of their attorney prior to the
16 judgment in this matter. Their last known contact information is as follows:

17 Jung Jin Corporation Park Hwa Sun
18 P.O. Box 503428 P.O. Box 503428
19 Saipan, MP 96950 Saipan, MP 96950
 (670) 235-4321 (670) 235-4321

22 9. The above-listed defendants have received notice by certified mail of all prior filings in
23 these post-judgment proceedings, and will receive a copy of this motion and the application for a
24 third order in aid of judgment by certified mail, return receipt requested to the above-listed
25 addresses.

1 10. Third-Party Pil Sun Kim Kitami will receive notice of this motion and the application for
2 a third order in aid of judgment through her attorney, Richard W. Pierce, via the Court's Electronic
3 Case Filing system.

4

5 WHEREFORE, for the foregoing reasons, Plaintiffs waive any hearing on their application
6 and this motion and respectfully request that the Court grant Plaintiffs' Application for a Third
7 Order in Aid of Judgment as soon hereafter as the Court will allow.

8

9 Respectfully submitted this 27th day of March, 2006.

10

11 /s/ Mark B. Hanson

12

MARK B. HANSON

13

Second Floor, Macaranas Building
Beach Road, Garapan
PMB 738 P.O. Box 10,000
Saipan, Mariana Islands 96950
Telephone: (670) 233-8600
Facsimile: (670) 233-5262
E-Mail: mark@saipanlaw.com

14

15

16

17 Attorney for Plaintiffs

18

19

20

21

22

23

24

25

26

27